

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In re TRANS UNION CORP. PRIVACY  
LITIGATION

Lead Case No. 00CV4729

MDL Docket No. 1350 OCT 15 2004

This Document Relates To:

Judge Robert W. Gettleman

ALL ACTIONS.

RECEIVED IN OCTOBER  
COURT, U.S. DISTRICT COURT

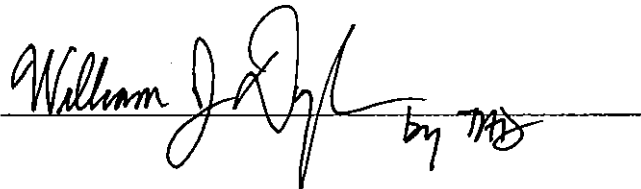
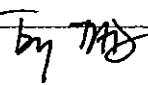
PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

DOCKETED  
OCT 19 2004

Pursuant to Rule 23 of the Federal Rules of Civil Procedure, and pursuant to the scheduling order entered by the Court on October 6, 2004, Plaintiffs respectfully request that the Court certify this case for class action treatment, as is more fully described in the accompanying Memorandum of Law. A Proposed Order is attached to this motion, for the Court's consideration.

DATED: October 15, 2004

Respectfully Submitted,

 by 

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**Liaison Counsel for Plaintiffs**

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[PROPOSED] ORDER IN SUPPORT OF PLAINTIFFS'  
MOTION FOR CLASS CERTIFICATION

The Court has considered the papers submitted by the parties and the arguments made by counsel. GOOD CAUSE APPEARING THEREFOR, the Court hereby GRANTS Plaintiffs' Motion for Class Certification and finds the following:

1. Classes A, B and C are so numerous that joinder is impracticable;
2. There are questions of law and fact common to the Classes;
3. The claims of the representative parties are typical of the claims of the Classes;
4. Plaintiffs will fairly and adequately protect the interests of the Classes;
5. Plaintiffs' counsel, Lerach Coughlin Stoia Geller Rudman & Robbins LLP ("Lerach Coughlin"), Prongay & Borderud and Righetti Wynne, P.C., will fairly and adequately represent the interests of the Class. In particular, the Court has considered the following:
  - (a) that plaintiffs' counsel has properly identified and investigated potential claims in this action;
  - (b) that plaintiffs' counsel is experienced in handling class actions, other complex litigation and claims of the type asserted in this action;
  - (c) that plaintiffs' counsel is knowledgeable concerning the laws applicable to this action; and
  - (d) that plaintiffs' counsel will commit the appropriate resources necessary to represent the Class;
6. Common questions of law and fact predominate over individual questions, and a class action is superior to other available adjudication methods; and
7. Defendants Trans Union and Axciom have acted on grounds generally applicable to Class C, making final injunctive and equitable relief appropriate with respect to Class C as a whole.

Therefore, the Court orders the following:

1. Classes A (nationwide), B (Illinois only) and C (California only) are certified under Fed. R. Civ. P. 23(b)(3) and/or 23(b)(2);
2. Plaintiffs Albert, Beadle, Comstock, DeRonde, Feige, Gogerty, Kearley, Mann, Martinelli, Lawrence and Joan Palazzolo, Boris and Alla Rozenblitt, Stein, Turner, Wayne, Winkelmann, and Woods shall be representatives of Class A;
3. Plaintiffs Albert, Gogerty, Mann, Turner and Woods shall be the representatives of Class B;
4. Plaintiffs Martinelli, Stein and Wayne shall be the representatives of Class C; and
5. The Lerach Coughlin, Prongay & Borderud and Righetti Wynne firms are designated as Class Counsel.

IT IS SO ORDERED.

DATED:                     

THE HONORABLE ROBERT W. GETTLEMAN  
UNITED STATES DISTRICT JUDGE

This Order Submitted by:

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**CERTIFICATE OF SERVICE**

I, Thomas A. Doyle, certify that I caused a true copy of the foregoing document to be served on October 15, 2004 on counsel listed below.

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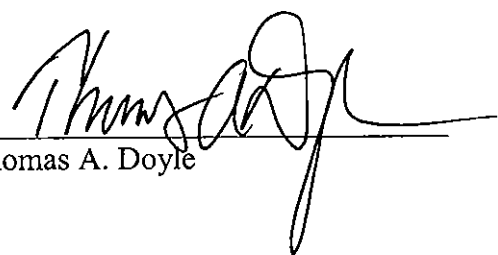
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